

Craig B. Friedberg, Esq.
LAW OFFICES OF CRAIG B. FRIEDBERG, ESQ.
Nevada Bar No. 004606
4760 South Pecos Road, Suite 103
Las Vegas, Nevada 89121
T. (702) 435-7968
E. attcbf@cox.net

Daniel A. Schlanger (admitted *pro hac vice*)
Evan S. Rothfarb (admitted *pro hac vice*)
SCHLANGER LAW GROUP, LLP
80 Broad Street, Suite 3103
New York, NY 10004
T. 212.500.6114
F. 646.612.7996
E. dschlanger@consumrprotection.net
E. erothfarb@consumerprotection.net

Counsel for Plaintiff David J. Moscato and the Putative Class

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

DAVID J. MOSCATO, *on behalf of himself
and all others similarly situated,*

Plaintiff,

v.

COMERICA BANK, CONDUENT STATE &
LOCAL SOLUTIONS, INC., and CONDUENT
BUSINESS SERVICES, LLC,

Defendants.

Case No. 2:23-cv-00993

**STIPULATION TO EXTEND TIME
TO FILE OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS CLASS ACTION
COMPLAINT
(First Request)**

ECF No. 15

It is hereby stipulated and agreed by and between the undersigned parties, Plaintiff David J. Moscato ("Plaintiff") and Defendants Comerica Bank, Conduent State & Local Solutions, Inc., and Conduent Business Services, LLC (collectively, "Defendants"), that the time to file

Plaintiff's opposition to Defendants' Motion to Dismiss Class Action Complaint filed on September 6, 2023 (ECF No. 10) and currently due on September 20, 2023, is extended to Thursday, October 5, 2023. Further, the parties state as follows:

1. The Class Action Complaint was filed on June 27, 2023 (Doc. No. 1).
2. Defendants filed their Motion to Dismiss Class Action Complaint on September 6, 2023 (Doc. No. 10).
3. Plaintiff's counsel is diligently working on preparing his response to the motion.
4. In the interest of justice and to ensure that the Court receives a well-prepared response, Plaintiff requests an extension of time to file the opposition.
5. Defendants, through their counsel, consent to the extension.
6. This is the first request for an extension of time to file opposition to Defendants' motion to dismiss.

Dated: September 15, 2023

/s/ Craig B. Friedberg

Craig Friedberg, Esq.
LAW OFFICES OF CRAIG B.
FRIEDBERG, ESQ.
South Pecos Road, Suite 103
Las Vegas, Nevada 89121
T. (702) 435-7968
E. attcbf@cox.net

/s/ Madeleine Coles

Madeleine Coles, Esq.
BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135
T. 702.471.7000
F. 702.471.7070
E. colesm@ballardspahr.com

Daniel A. Schlanger (admitted *pro hac vice*)
Evan S. Rothfarb (admitted *pro hac vice*)
SCHLANGER LAW GROUP, LLP
80 Broad Street, Suite 3103
New York, NY 10004
T. 212.500.6114
F. 646.612.7996

John C. Grugan, Esq.
Pro Hac Vice Forthcoming
Jenny N. Perkins, Esq.
Pro Hac Vice Forthcoming
BALLARD SPAHR LLP
1735 Market Street, 51st Floor
Philadelphia, Pennsylvania 19103

E. dschlanger@consumrprotection.net
E. erothfarb@consumerprotection.net

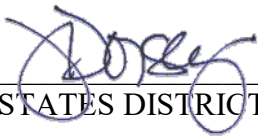
T. 215.665.8500
E. gruganj@ballardspahr.com
E. perkinsj@ballardspahr.com

Attorneys for Plaintiff and the Putative Class

Mitchell Turbenson
Pro Hac Vice Forthcoming
BALLARD SPAHR LLP
1 East Washington Street, Suite 2300
Phoenix, Arizona 85004
T. 602.798.5400
E. turbensonm@ballardspahr.com

*Attorneys for Defendants Comerica Bank,
Conduent State & Local Solutions, Inc.,
and Conduent Business Services, LLC*

Based on the parties' stipulation [ECF No. 17] and with good cause appearing, IT IS ORDERED that plaintiff's deadline to respond to the motion to dismiss [ECF No. 10] is extended to October 5, 2023.


UNITED STATES DISTRICT JUDGE

DATED: 9/19/23